

# EXHIBIT D

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UNITED STATES DISTRICT COURT  
DISTRICT OF ARIZONA

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In Re Bard IVC Filters § No. MD-15-02641-PHX-DGC  
Products Liability Litigation §  
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Friday, August 25, 2017

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\*\* DO NOT DISCLOSE \*\*  
\*\* SUBJECT TO FURTHER CONFIDENTIALITY REVIEW \*\*

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Videotaped deposition of DANIEL COUSIN, M.D.,  
held at Courtyard Fort Lauderdale Weston, 2000  
North Commerce Parkway, Fort Lauderdale, Florida,  
commencing at 12:03 p.m., on the above date, before  
Susan D. Wasilewski, Registered Professional  
Reporter, Certified Realtime Reporter, Certified  
Realtime Captioner, Certified Manager of Reporting  
Services, Florida Professional Reporter, Certified  
Court Reporter (NJ), and Realtime Systems  
Administrator

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1 and -- along the responsibilities and roles for a  
2 radiologist in that setting.

3 Q. All right. Are you able to tell me how many  
4 different radiologists breached the standard of  
5 care, in your opinion, in their interpretation of  
6 Ms. Booker's imaging studies?

7 A. Not right now. I don't think I delineated the  
8 actual names of the radiologists, just the reports.

9 Q. All right.

10 A. Well, actually, no, I take that back. Let me  
11 look here. I wrote this a while ago. Okay. So there  
12 is Dr. Stephen Kardon, that was on 2/20/2008.

13 Then there was 6/26/2014 --

14 MS. HELM: You missed one in that paragraph.

15 THE WITNESS: Oh.

16 A. Oh, okay. Sorry. Dr. Sarwat Kamal Amer.

17 Q. Spell that last name for us.

18 A. A-m-e-r. That's on March 26, 2009. That was  
19 another op -- missed opportunity.

20 So we have at least two radiologists,  
21 different radiologists reading different studies, but  
22 I just don't think I have other radiologists listed  
23 here. I'd have to go to the initial report, because  
24 all these bullet points are times when the pathology  
25 was clearly there, and I felt in those instances they